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December 10, 2021

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Via Electronic Filing

Honorable Eric R. Komitee
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom: 6G North
Brooklyn, New York 11201

Re: Edmondson, et al. v Raniere, et al.

Dear Judge Komitee:

We are writing to you to respectfully request an extension of one week from today's 5 p.m. deadline to file Plaintiffs' submission in further support of their motion for a protective order permitting some Plaintiffs to proceed in the litigation using pseudonyms or first names only. (Minute Order, Dec. 1, 2021, No. 120). Plaintiffs' submission will consist of a letter further discussing the applicable law governing protection of plaintiff identities and the sealing of court filings and how that law applies to the Plaintiffs' individual circumstances, along with a substantial attorney declaration that will include non-public and highly sensitive individualized facts and circumstances for each Plaintiff supporting his or her request for some protection at this stage in the litigation. The declaration in support of the motion, in turn, will contain exhibits, many of which contain confidential information such as declarations and medical records that were provided by Plaintiffs to the government which filed them under seal in the criminal restitution proceeding.

When this was discussed at the November 30, 2021, status conference, we thought ten days would be sufficient. However, this has turned out to be a much larger and time-consuming undertaking. In the first instance, after conducting an initial evaluation of each Plaintiff's circumstances in light of the concerns expressed by Your Honor, we have obtained consent from a number of Plaintiffs to proceed using their full names, while several others have instructed us

to withdraw them from the action. This reduces substantially the universe of Plaintiffs who continue to request protection. However, for each of the 73 Plaintiffs who were not fully identified in the First Amended Complaint, the work required to prepare the submission entails pouring over all our records for each one, consulting with them, searching the record in the criminal proceeding and searching widely on the internet for any mention of them, and evaluating all of those circumstances so that we can both provide clients with advice and present to the Court an accurate declaration that fully discloses all facts that we believe pertinent to the Court's decision-making process. We request the additional time so that we can present to the Court the full picture, with confidence that we will not need to ask permission to supplement except with respect to a particular issue we raise in the submission for which the Court may request additional documentation.

We have not previously requested an extension of this or any other deadline. Because this is an ex parte submission to the Court, no responses from opposing parties are required. This extension will not affect any other scheduled dates on the calendar. Plaintiffs thus respectfully request that the Court extend the deadline for this submission to 5 p.m. on Friday, December 17, 2021.

Respectfully Submitted,



Neil L. Glazer

NLG/csm

cc: All counsel and pro se defendants via ECF